

BMCSP 19.8.2  
9/06/02

BOOZ ALLEN & HAMILTON INC.

701 5TH AVENUE • SUITE 4610 • SEATTLE, WASHINGTON 98104 • TELEPHONE: (206) 386-4794 • FAX: (206) 386-4790

September 6, 2002  
B-09075-0144-0110  
REPA3-1010-004

RECEIVED

SEP 09 2002

OFFICE OF WASTE  
& CHEM. MGMT.

Ms. Amberet Green  
Region 10 Project Officer  
U.S. Environmental Protection Agency  
1200 6<sup>th</sup> Avenue - WCM-122  
Seattle, WA 98101

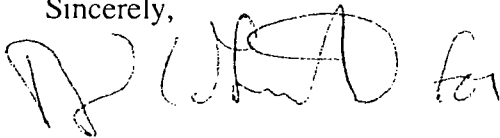
Subject: EPA Contract No. 68-W-02-022, Work Assignment R10210, Task 7,  
Remediation Plans

Dear Ms. Green:

In response to Work Assignment R10210, Task 7 under EPA Contract 68-W-02-022, Booz Allen Hamilton Inc., is pleased to provide the technical review comments for the Pre-Final Remedial Design Report and Draft Remedial Action Work Plan for the Dewatering Pit Solids Removal at the Simplot Don Plan located in Pocatello, Idaho.

If you have any questions or comments concerning this deliverable, please contact me at (206) 386-4791.

Sincerely,



Pat Shanley  
Regional Manager

BOOZ ALLEN HAMILTON INC.

Enclosures

cc: Linda Meyer, EPA Work Assignment Manager  
Valloree Lilley, EPA Contracting Officer (cover letter only)  
BAH PMT

USEPA SF



1348962

**TECHNICAL REVIEW OF THE  
PRE-FINAL REMEDIAL DESIGN REPORT AND  
DRAFT REMEDIAL ACTION WORK PLAN  
FOR THE DEWATERING PIT SOLIDS REMOVAL**

**SIMPLOT PLANT AREA EASTERN MICHAUD FLATS SUPERFUND SITE  
POCATELLO, IDAHO**

**REPA3-1010-04  
SEPTEMBER 6, 2002**

Work Assignment: R10210, Simplot Superfund  
Task 7, Remediation Plans

Documents Reviewed: Pre-Final Remedial Design Report and Draft Remedial Action  
Work Plan for the Dewatering Pit Solids Removal

**General Comments**

1. The Record of Decision (ROD) and the plan call for the removal of dewatering pits solids and the placement of these solids on the gypstack. A review of Table 1 in the plan indicates that the solids in the dewatering pit could potentially be characteristic waste due to total metals levels for constituents such as cadmium. The gypstack is currently a Bevill exempt unit. There is no assessment of the impact of potentially mixing hazardous and Bevill exempt wastes.
2. Because the dewatering pit was characterized with a single boring during the RI, and because the proposed plan relies on recognizing visual differences in material to guide the excavation, regulatory agencies may wish to consider providing field oversight and/or split sampling in order to confirm cleanup levels have been reached.

**Section 2.2, Table 1**

3. A single boring was used to characterize the dewatering pit solids and extent of contamination in native soils. The text proposes to use zinc as a surrogate for confirmation sampling. Since arsenic and beryllium are the risks drivers, and because it is not known if these or other constituents (such as chrome and cadmium) have migrated below levels indicated in Table 1, zinc should not be used to demonstrate adequate removal of solids. A confirmation sampling plan should be developed that looks at all constituents in the dewatering pit.
4. Selenium is not included in the analysis. Selenium results should be included in Table 1. Selenium should also be evaluated as part of the confirmation sampling protocol.